

**Exhibit C**

**Voorhees Declaration**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 22-11068 (JTD)  
)  
) (Jointly Administered)  
)  
)

**DECLARATION OF ALEX VAN VOORHEES IN SUPPORT OF APPLICATION OF  
THE OFFICIAL COMMITTEE OF UNSECURED TO RETAIN AND EMPLOY YOUNG  
CONAWAY STARGATT & TAYLOR, LLP AS CO-COUNSEL,  
EFFECTIVE AS OF DECEMBER 22, 2022**

Pursuant to 28 U.S.C. § 1746, I, Alex van Voorhees, solely in my capacity as the co-chair of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submit this declaration (this “Declaration”) under penalty of perjury:

1. I am over the age of 21 and am competent in all respects to make this Declaration. I make this Declaration in support of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022* (the “Application”).<sup>2</sup> Except as otherwise noted, I have made the statements herein on information and belief and in reliance on statements made to me by the Committee and its professionals.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Application.

2. This Declaration is provided pursuant to the Revised U.S. Trustee Guidelines (as defined in the Lunn Declaration).

3. Following the Committee's formation and selection of Paul Hastings as counsel, the Committee selected Young Conaway to serve as co-counsel based on, among other things, Young Conaway's extensive knowledge, expertise, and experience in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. Young Conaway's knowledge, expertise, and experience practicing before the Court will enable the Firm to work in an efficient and cost-effective manner on behalf of the Committee. Since the Firm's engagement on December 22, 2022, Young Conaway immediately began advising the Committee on, among other things, Local Rules, practices, and procedures in the Court with respect to various pleadings and discovery matters. Therefore, the Committee believes that Young Conaway is uniquely qualified to serve as co-counsel in these Chapter 11 Cases.

4. Young Conaway has informed the Committee that its current hourly rates are the Firm's standard hourly rates for work of this nature. The Committee understands that such rates are comparable to the rates of firms similar to Young Conaway and do not vary as a function of whether the services performed relate to a bankruptcy engagement or a non-bankruptcy engagement. Young Conaway has informed the Committee that its hourly rates are subject to periodic adjustments to reflect economic and other conditions.

5. Throughout these Chapter 11 Cases, the Committee will supervise the fees and expenses incurred by Young Conaway to manage costs. In particular, a member of the Committee will review Young Conaway's invoices and monthly applications for payment of fees and reimbursement of expenses. The Committee understands that Young Conaway historically

increases the hourly billing rates for its professionals and paraprofessionals on a yearly basis, and the Committee has consented to such ordinary course rate increases.

6. Young Conaway has informed me that it intends to prepare and provide to the Committee a budget and staffing plan to comply with the Revised U.S. Trustee Guidelines, recognizing that in the course of complex chapter 11 cases such as these Chapter 11 Cases, there are likely to be unforeseeable fees and expenses.

7. Based on the foregoing, the Committee is of the opinion that it is necessary and appropriate to employ Young Conaway and that such employment is in the best interest of the Debtors' estates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 18th day of January, 2023.

GGC International, Ltd., solely in its capacity as  
Co-Chair of the Official Committee of Unsecured  
Creditors of FTX Trading, Ltd., *et al.*

By: /s/ Alex van Voorhees

Name: Alex van Voorhees

Title: Authorized Signatory